

Exhibit F

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

La Unión Del Pueblo Entero, *et al.*,

Plaintiffs

v.

**No. 5:21-cv-00844-XR
(Consolidated Cases)**

Gregory W. Abbott, *et al.*,

Defendants.

**MI FAMILIA VOTA PLAINTIFFS' ANSWERS AND RESPONSES TO INTERVENOR-
DEFENDANTS' FIRST SET OF REQUESTS FOR PRODUCTION**

COME NOW Mi Familia Vota, Marla Lopez, Marlon Lopez, and Paul Rutledge (the “Mi Familia Vota Plaintiffs” or “Plaintiffs”), by and through their counsel of record, Stoel Rives LLP, and, pursuant to Federal Rules of Civil Procedure 26 and 34 respond to Intervenor-Defendants’ Requests for Production of Documents as follows:

GENERAL STATEMENT

Mi Familia Vota Plaintiffs provide these Answers and Responses to the Intervenor Defendants’ Requests for Production to Plaintiffs (the “Discovery Requests”). These responses are made solely for the purpose of this action. Each Answer and Response is subject to all objections as to competence, relevance, materiality, propriety, and admissibility, and to any and all other objections on any grounds that would require the exclusion of any statements contained herein if such Discovery Request were asked of, or statements contained herein were made by, a witness testifying in court, all of which objections and grounds are hereby expressly reserved and may be interposed at the time of trial.

The Answers and Responses submitted herein shall not be deemed to constitute admissions

(i) that any particular document or thing exists, is relevant, is nonprivileged, or is admissible in evidence; or (ii) that any statement or characterization in the Discovery Requests is accurate or complete.

The documents produced in response to the Discovery Requests are those documents that were located on a reasonable search of Mi Familia Vota Plaintiffs' files as they are kept in the ordinary course of business and the files of those individuals most likely to have responsive documents. Mi Familia Vota Plaintiffs object to these Discovery Requests to the extent that any such Request calls for a search of all files or all locations of Mi Familia Vota Plaintiffs. The responses given herein are without prejudice to Mi Familia Vota Plaintiffs' right to produce any subsequently discovered documents or to revise these discovery responses if further discovery so indicates.

Mi Familia Vota Plaintiffs reserve the right to amend or further supplement the responses provided herein.

GENERAL OBJECTIONS TO DISCOVERY REQUESTS

1. Mi Familia Vota Plaintiffs object to the Discovery Requests to the extent that they seek disclosure of information that would infringe upon the associational rights protected by the First Amendment to the United States Constitution.

2. To the extent the Discovery Requests may be construed as calling for documents or information subject to a claim of privilege, including, without limitation, the attorney-client privilege or work product privilege, Mi Familia Vota Plaintiffs hereby claim such privilege and object to the discovery on that basis. Information subject to these privileges will be withheld or redacted. Plaintiffs intend to screen all materials to be released to the Intervenor Defendants to

remove privileged matters; however, there is a possibility that privileged information may have been inadvertently disclosed. By accepting any production, the Intervenor agrees that, to the extent there is any inadvertent disclosure of privileged information, it shall not constitute any waiver of privileges, and all such material shall be immediately returned to Mi Familia Vota Plaintiffs. Mi Familia Vota Plaintiffs reserve the right to object to the introduction into evidence before the Court at any time before or at trial of information that is privileged under law and that has been revealed or produced inadvertently. Mi Familia Vota Plaintiffs do not, by responding to these Discovery Requests, waive any claim of privilege or right to assert attorney work product.

3. Mi Familia Vota Plaintiffs object to these Discovery Requests to the extent they call for information that is not in Plaintiffs' possession, or information that is a matter of public record or otherwise equally available to the Intervenor, or which call for Mi Familia Vota Plaintiffs to supply information generated by other persons and/or entities.

4. Mi Familia Vota Plaintiffs object to the requests to the extent they would require Plaintiffs to reproduce documents that were already produced in this litigation. Documents that were already produced will not be re-produced.

5. All specific Answers and Responses to these Discovery Requests are provided without waiver of, and with express reservation of:

(a) All objections to the competency, relevancy, materiality, foundation, and admissibility of the responses and the subject matter thereof as evidence in any further proceedings in this action, including trial, or in any other action;

(b) The right to object on any ground at any time to a demand or Request for further responses to these or any other Discovery Requests; and

(c) The right to move for a protective order to protect the confidentiality of any information disclosed or for any other purpose provided by law.

6. Mi Familia Vota Plaintiffs object to these Discovery Requests to the extent they are overly broad, are unduly burdensome, seek information that is not relevant to the subject matter of this action, and are not reasonably calculated to lead to the discovery of admissible evidence. Where appropriate, Mi Familia Vota Plaintiffs will respond with a reasonable limitation in time and/or scope.

7. Mi Familia Vota Plaintiffs object to these Discovery Requests to the extent they are vague, ambiguous, duplicative, and/or subject to multiple interpretations.

8. Mi Familia Vota Plaintiffs object to these Discovery Requests to the extent they call for information that is not in Mi Familia Vota Plaintiffs' possession, or information that is a matter of public record or otherwise equally available to the Intervenor Defendants, or which call for Mi Familia Vota Plaintiffs to supply information generated by other persons and/or entities.

9. Mi Familia Vota Plaintiffs object to these Discovery Requests to the extent they seek an admission regarding a genuine issue for trial or call for a legal conclusion.

10. The Answers and Responses set forth below represent Mi Familia Vota Plaintiffs' present knowledge, based on discovery, investigation, and trial preparation to date. Discovery, investigation, and trial preparation are continuing. Mi Familia Vota Plaintiffs reserve the right to rely upon any further information adduced upon completion of discovery, investigation, and trial preparation.

The General Objections are incorporated into each of the responses and objections set forth below, which are made without waiver of any of these General Objections.

REQUEST NO. 1: All documents sent to, exchanged with, or reflecting communications with the Texas Legislature relating to SB 1, SB 7, HB 3, or HB 6.

RESPONSE: Mi Familia Vota Plaintiffs object to this Request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing general and specific objections, see, for example and not by way of limitation, documents bates stamped MFV0011870-MFV011999.

REQUEST NO. 2: All documents sent to, exchanged with, or reflecting communications with the Texas Legislature relating to election administration, voting, election integrity, minority voting rights, voting accessibility for individuals with a disability, or the conduct of elections from January 1, 2020, to present.

RESPONSE: Mi Familia Vota Plaintiffs object to this Request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing general and specific objections, see, for example and not by way of limitation, documents bates stamped MFV011953-MFV011954; MFV011878-MFV011906; MFV011911-MFV011920; MFV011975-MFV011994.

REQUEST NO. 3: All documents sent to, exchanged with, or reflecting communications with the Office of the Texas Governor, the Office of the Texas Attorney General, the Office of the Texas

Lieutenant Governor, or the Office of the Texas Secretary of State relating to SB 1, SB 7, HB 3, or HB 6.

RESPONSE: Mi Familia Vota Plaintiffs object to this Request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing general and specific objections, Mi Familia Vota Plaintiffs have not identified documents responsive to this Request.

REQUEST NO. 4: All documents sent to, exchanged with, or reflecting communications with the Office of the Texas Governor, the Office of the Texas Attorney General, the Office of the Texas Lieutenant Governor, or the Office of the Texas Secretary of State relating to election administration, voting, election integrity, minority voting rights, voting accessibility for individuals with a disability, or the conduct of elections from January 1, 2020, to the present.

RESPONSE: See response to Request No. 3. Mi Familia Vota Plaintiffs incorporate their response to Request No. 3 by reference here.

REQUEST NO. 5: All documents sent to, exchanged with, or reflecting communications with the Office of the Elections Administrator of Harris County or the Office of the Elections Administrator of Dallas County relating to election administration, voting, election integrity, minority voting rights, voting accessibility for individuals with a disability, or the conduct of elections from January 1, 2020 to the present.

RESPONSE: Mi Familia Vota Plaintiffs object to this Request as overbroad and unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing general and specific objections, Mi Familia Vota Plaintiffs previously produced documents responsive to this Request.

REQUEST NO. 6: All documents sent to, exchanged with, or reflecting communications with the following organizations, including any of their affiliates or subsidiaries, and the current and former employees, officers, attorneys, agents, trustees, investigators, representatives, contractors, consultants thereof, or other persons or entities acting on their behalf or subject to their control, relating to SB 1, SB 7, HB 3, or HB 6:

- (a) Any other Plaintiff in the above-captioned consolidated cases;
- (b) Any national, state, or local Democratic Party committee or organization;
- (c) Open Society Foundations;
- (d) Priorities USA;
- (e) Progressive Voting Bloc;
- (f) MoveOn.org;
- (g) Fair Fight;
- (h) MOVE Texas;
- (i) EMILY's List;
- (j) Project Vote; and
- (k) Democracy 21.

RESPONSE: Mi Familia Vota Plaintiffs object to this Request as overbroad, unduly burdensome, disproportionate to the needs of the case, and because it seeks documents protected by the First Amendment, the attorney-client privilege, the common interest privilege, and the work product doctrine. Subject to and without waiving the foregoing general and specific objections, see, for

example and not by way of limitation, documents bates stamped MFV011948-MFV011952; MFV011955-MFV011957; MFV011939-MFV011946; MFV011870-MFV011873; MFV011947-MFV011947; MFV011876-MFV011877; MFV011909-MFV011910; MFV011921-MFV011938; MFV011958-MFV011970.

REQUEST NO. 7: All documents sent to, exchanged with, or reflecting communications with the following organizations, including any of their affiliates or subsidiaries, and the current and former employees, officers, attorneys, agents, trustees, investigators, representatives, contractors, consultants thereof, or other persons or entities acting on their behalf or subject to their control, relating to election administration, voting, election integrity, or the conduct of elections from January 1, 2020 to present:

- (a) Any other Plaintiff in the above-captioned consolidated cases;
- (b) Any national, state, or local Democratic Party committee or organization;
- (c) Open Society Foundations;
- (d) Priorities USA;
- (e) Progressive Voting Bloc;
- (f) MoveOn.org;
- (g) Fair Fight;
- (h) MOVE Texas;
- (i) EMILY's List;
- (j) Project Vote; and
- (k) Democracy 21.

RESPONSE: Mi Familia Vota Plaintiffs object to this Request as duplicative of Request No. 6. Mi Familia Vota Plaintiffs incorporate their response to Request No. 6 by reference here.

REQUEST NO. 8: All documents sent to, exchanged with, or reflecting communications with any candidate or potential candidate for elected office in Texas relating to the effects or potential effects of SB 1, SB 7, HB 3, or HB 6.

RESPONSE: Mi Familia Vota Plaintiffs object to this Request as overbroad and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing general and specific objections, and on the premise that current elected officials may also be candidates to remain in office, Mi Familia Vota Plaintiffs previously produced documents responsive to this Request. Further, see, for example and not by way of limitation, documents bates stamped MFV011953-MFV011954; MFV011878-MFV011906; MFV011911-MFV011920; MFV011975-MFV011994.

REQUEST NO. 9: All documents sent to, exchanged with, or reflecting communications with candidates or potential candidates for elected office in Texas relating to election administration, voting, election integrity, minority voting rights, voting accessibility for individuals with a disability, or the conduct of elections during the period from January 1, 2020, to present.

RESPONSE: Mi Familia Vota Plaintiffs object to this Request as overbroad and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing general and specific objections, and on the premise that current elected officials may also be candidates to remain in office, Mi Familia Vota Plaintiffs previously produced documents responsive to this Request. Further, see, for example and not by way of limitation, documents

bates stamped MFV011953-MFV011954; MFV011878-MFV011906; MFV011911-MFV011920; MFV011975-MFV011994.

REQUEST NO. 10: All documents relating to the recruitment, retention, and training of election judges, election clerks, and other poll workers in Texas from January 1, 2018, to present, including but not limited to, any training materials or presentations created, used, or disseminated in any way by You.

RESPONSE: Mi Familia Vota Plaintiffs object to this Request as overbroad and not reasonably calculated to lead to the discovery of admissible evidence. Mi Familia Vota Plaintiffs have not identified documents responsive to this Request.

REQUEST NO. 11: All documents relating to the recruitment and training of poll watchers in Texas from January 1, 2018, to present, including but not limited to, any training materials or presentations created, used, or disseminated in any way by You.

RESPONSE: Mi Familia Vota Plaintiffs object to this Request as overbroad and not reasonably calculated to lead to the discovery of admissible evidence. Mi Familia Vota Plaintiffs have not identified documents responsive to this Request.

REQUEST NO. 12: All documents relating to instances of violence, discrimination, harassment, intimidation, or any inappropriate behavior from poll watchers, election judges, election clerks, or other poll workers in Texas from January 1, 2018, to present.

RESPONSE: Mi Familia Vota Plaintiffs object to this Request as unduly burdensome, overbroad, vague, ambiguous, and disproportionate to the needs of this case. Mi Familia Vota Plaintiffs further

object as not proportion with the needs of the case because this Requests seeks information already in the Intervenor's possession, custody, or control or equally available to Intervenor. Subject to and without waiving the foregoing general and specific objections, Mi Familia Vota Plaintiffs previously produced documents responsive to this Request. Mi Familia Vota Plaintiffs will produce any additional responsive, nonprivileged documents if located following a reasonable search.

REQUEST NO. 13: All documents relating to allegations, investigations, and discussions of illegal voting, election fraud, or any kind of criminal conduct in connection with the following methods of voting in Texas during the period from January 1, 2018, to the present:

- (a) Drop box voting;
- (b) Drive-thru voting;
- (c) Extended hour voting;
- (d) Straight-ticket voting;
- (e) Vote-by-mail;
- (f) Early voting;
- (g) Curbside voting;
- (h) Voter assistance, including transportation assistance for curbside voters; or
- (i) "Vote harvesting services," as defined by SB 1.

RESPONSE: Mi Familia Vota Plaintiffs object to this Request as not proportion with the needs of the case because this Requests seeks information already in the Intervenor's possession, custody, or control or equally available to Intervenor. Mi Familia Vota Plaintiffs further object to this Request as duplicative of the State Defendants' Interrogatory No. 7. Subject to and without

waiving the foregoing general and specific objections, Mi Familia Vota Plaintiffs previously produced documents responsive to this Request.

REQUEST NO. 14: All documents relating to the impact or potential impact of SB 1, SB 7, HB 3, or HB 6 on demographic groups, including but not limited to, racial or ethnic minorities, persons with disabilities, persons with limited English proficiency, or partisan affiliation.

RESPONSE: Mi Familia Vota Plaintiffs object to this Request as not proportion with the needs of the case because this Requests seeks information already in the Intervenor's possession, custody, or control or equally available to Intervenor. Mi Familia Vota Plaintiffs further object to this Request as duplicative of the State Defendants' Interrogatory Nos. 8 and 9. Subject to and without waiving the foregoing general and specific objections, Mi Familia Vota Plaintiffs previously produced documents responsive to this Request.

REQUEST NO. 15: All documents relating to usage of the following methods of voting in Texas by demographic groups, including but not limited to, racial or ethnic minorities, persons with limited English proficiency, persons with disabilities, or partisan affiliation, during the period from January 1, 2020, to present:

- (a) Drop box voting;
- (b) Drive-thru voting;
- (c) Extended hour voting;
- (d) Straight-ticket voting;
- (e) Vote-by-mail;
- (f) Early voting;

- (g) Curbside voting;
- (h) Voter assistance, including transportation assistance for curbside voters; or
- (i) “Vote harvesting services,” as defined by SB 1.

RESPONSE: Mi Familia Vota Plaintiffs object to this Request as not proportion with the needs of the case because this Requests seeks information already in the Intervenors’ possession, custody, or control or equally available to Intervenors. Subject to and without waiving the foregoing general and specific objections, Mi Familia Vota Plaintiffs will produce responsive, nonprivileged documents if located following a reasonable search.

REQUEST NO. 16: All documents relating to the impact or potential impact of SB 1, SB 7, HB 3, or HB 6 on residents of the following counties:

- (a) Bexar County;
- (b) Dallas County;
- (c) Harris County;
- (d) El Paso County;
- (e) Hidalgo County; or
- (f) Travis County.

RESPONSE:

Mi Familia Vota Plaintiffs object to this Request as not proportion with the needs of the case because it seeks information to which other parties have easier relative access. Subject to and without waiving its general and specific objections, Mi Familia Vota Plaintiffs have not identified documents responsive to this Request.

REQUEST NO. 17: All documents, including but not limited to communications, relating to the number or proportion of Texas residents, Texas citizens of voting age, or Texas registered voters who have or who lack a Texas Driver's License, a Texas Election Identification Certificate, a Texas Personal Identification Card, or a Social Security Number, including patterns by race, ethnicity, disability status, or party affiliation from January 1, 2020, to present.

RESPONSE: Mi Familia Vota Plaintiffs object to this Request as vague and overbroad and as not proportion with the needs of the case because it seeks information to which other parties have easier relative access. Subject to and without waiving its general and specific objections, Mi Familia Vota Plaintiffs have not identified documents responsive to this Request.

REQUEST NO. 18: All documents relating to questions or complaints received from voters about SB 1's requirements to provide an identification number on Applications for Ballot By Mail and to provide an identification number on the carrier envelope of a mail ballot.

RESPONSE: Mi Familia Vota Plaintiffs object to this Request as vague and overbroad. Subject to and without waiving the foregoing general and specific objections, Mi Familia Vota Plaintiffs will produce responsive, nonprivileged documents if located following a reasonable search.

REQUEST NO. 19: All documents relating to voter assistance, including transportation assistance for curbside voters, and "vote harvesting services" as defined by SB 1, and patterns of requests for voter assistance by race, ethnicity, disability status, or party affiliation during the period from January 1, 2020, to present.

RESPONSE: Mi Familia Vota Plaintiffs object to this Request as overbroad, vague with respect to "patterns of requests," and confusing. Subject to and without waiving the foregoing general and

specific objections, Mi Familia Vota Plaintiffs will produce responsive, nonprivileged documents if located following a reasonable search.

REQUEST NO. 20: All documents relating to the demographics of Texas voters; voter turnout by particular demographic groups, including but not limited to, racial or ethnic minorities, persons with limited English proficiency, persons with disabilities, or partisan affiliation; or particular voting practices in Texas.

RESPONSE: Mi Familia Vota Plaintiffs object to this Request as not proportion with the needs of the case because it seeks information to which other parties have easier relative access and seeks documents already produced by other parties in this litigation.

REQUEST NO. 21: All documents identified in response to Intervenor-Defendants' First Set of Interrogatories 6–13.

RESPONSE: Mi Familia Vota Plaintiffs restate and incorporate their objections to Interrogatories Nos. 6 through 13. Mi Familia Vota Plaintiffs further object to this Request as compound, duplicative, unduly burdensome, overbroad, vague, ambiguous, and disproportionate to the needs of this case. Mi Familia Vota Plaintiffs further object to this Request for Production to the extent it seeks documents and communications that are protected by the First Amendment privilege, the attorney-client privilege, the work product doctrine, or any other applicable privilege that may be identified upon review of documents.

Subject to and without waiving the foregoing general and specific objections, see, for example and not by way of limitation, documents bates stamped MFV0011870-MFV011999.

DATED: November 4, 2022

STOEL RIVES LLP

/s/ Bradley R. Prowant
Bradley R. Prowant (*admitted pro hac vice*)
bradley.prowant@stoel.com
33 South Sixth Street, Suite 4200
Minneapolis, MN 55402
Telephone: 612.373.8800
Facsimile: 612.373.8881

Wendy J. Olson (*admitted pro hac vice*)
wendy.olson@stoel.com
Elijah M. Watkins (*admitted pro hac vice*)
elijah.watkins@stoel.com
Mark L. Bieter (*admitted pro hac vice*)
mark.bieter@stoel.com
101 S. Capitol Blvd., Suite 1900
Boise, ID 83702
Telephone: 208.389.9000
Facsimile: 208.389.9040

Laura E. Rosenbaum (*admitted pro hac vice*)
laura.rosenbaum@stoel.com
760 SW Ninth Avenue., Suite 3000
Portland, OR 97205
Telephone: 503.224.3380
Facsimile: 503.220.2480

FREE SPEECH FOR PEOPLE

Courtney Hostetler (*admitted pro hac vice*)
chostetler@freespeechforpeople.com
Ben Clements (*admitted pro hac vice*)
bclements@freespeechforpeople.com
John Bonifaz (*admitted pro hac vice*)
jbonifaz@freespeechforpeople.com
1320 Centre St., #405
Newton, MA 02459
Telephone: 617.249.3015

LYONS & LYONS, PC

Sean M. Lyons
sean@lyonsandlyons.com
Clem Lyons
clem@lyonsandlyons.com
237 W. Travis St., Suite 100
San Antonio, TX 78205

Attorneys for Mi Familia Vota Plaintiffs

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served in compliance with the Federal Rules of Civil Procedure upon the following via electronic mail:

John M. Gore
E. Stewart Crosland
Stephen J. Kenny
Charles E.T. Roberts
JONES DAY
51 Louisiana Avenue, N.W.
Washington, D.C. 20001
jmgore@jonesday.com
scrosland@jonesday.com
skenny@jonesday.com
cetroberts@jonesday.com

/s/ Bradley R. Prowant
Bradley R. Prowant